

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AUGUSTUS WRIGHT,

Defendant.

No. 08 CR 00106

Judge James B. Moran

**DEFENDANT, AUGUSTUS WRIGHT'S MOTION TO REQUIRE
GOVERNMENT TO MAKE A SANTIAGO PROFFER STATEMENT**

NOW COMES the defendant, AUGUSTUS WRIGHT (hereinafter, "defendant"), by and through his attorney, STANLEY L. HILL, and respectfully moves this Honorable Court for an order directing that the government be required to make a Santiago Proffer Statement prior to permitting any hearsay testimony to be used against defendant and/or any co-defendant[s].

Respectfully submitted,

/s/ Stanley L. Hill

Attorney Code: 15355
Stanley L. Hill
STANLEY L. HILL & ASSOCIATES, P.C.
651 West Washington Boulevard, Suite 205
Chicago, Illinois 60661
T. 312.917.8888
F. 312.781.9401
E. stanhill@core.com
W. www.stanhilllaw.com